

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :
MOE, individually and on behalf of all others similarly :
situated, :
: *Plaintiffs*, :
: No. 1:18-cv-09936 (LGS)
v. :
: THE TRUMP CORPORATION, DONALD J. TRUMP, in :
his personal capacity, DONALD TRUMP, JR., ERIC :
TRUMP, and IVANKA TRUMP, :
: *Defendants*. :
: -----X

**SUPPLEMENTAL DECLARATION OF DAVID SPEARS PURSUANT TO LOCAL
RULE 1.4**

I, David Spears, declare and state as follows:

1. I am a partner at Spears & Imes LLP, co-counsel for Defendants The Trump Corporation, Donald J. Trump in his personal capacity, Donald Trump, Jr., Eric Trump and Ivanka Trump. Pursuant to Local Civil Rule 1.4, I respectfully submit this supplemental declaration in support of my request for the leave of the Court to withdraw my individual appearance as counsel for Defendants (ECF No. 75) and ask that this declaration be considered in connection with that earlier request. Joanna C. Hendon, Cynthia Chen, and Bradley Pollina, also from the law firm of Spears & Imes LLP, also represent Defendants in this case.

2. My partner Joanna C. Hendon, who has been lead counsel for the President in another matter in this District for nearly a year, filed a notice of appearance in this case on January 14, 2019 and has taken over responsibility from me for the case. Ms. Hendon prepared and filed Defendants' motion to dismiss and supporting papers on January 14, 2019. I have

substantial commitments in other matters that will fully occupy my time for the foreseeable future.

3. I am causing this supplemental declaration to be served on Spears & Imes LLP's clients in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 1, 2019
New York, New York

By: /s/ David Spears
David Spears